

**Federal Defenders
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MEMO ENDORSED

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Via E-mail and ECF

August 14, 2020

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: U.S. v. Martin DeJesus Reyes-Maria
19 Cr 856 (KMK)

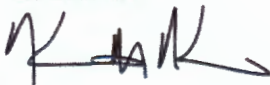
Dear Honorable Karas:

I am writing to respectfully request that Your Honor toll the motions schedule that has been set for Mr. Reyes-Maria. I have sought one prior extension, which was granted on July 24, 2020. I am requesting this adjournment because I have submitted mitigation to the Government and my understanding is that the Government is in the process of putting together a written plea agreement for Mr. Reyes-Maria. Under these circumstances, I ask that Your Honor grant a two-week extension. I have spoken to AUSA James Ligtenberg, and he does not object to this request.

Thank you for your consideration.

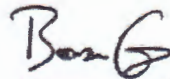
Granted.

So Ordered.



8/14/20

Respectfully,



Benjamin Gold
Assistant Federal Defender

cc: AUSA James Ligtenberg (via e-mail and ECF)
Barry Ross Goldberg (attorney for Jonathan Jimenez) (via e-mail and ECF)
Brian Ira Kaplan (attorney for Mayobanex Reyes) (via e-mail and ECF)